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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

Sanjay Bhatnagar,

Plaintiff,

vs.

The United States of America,

**Defendant.**

Case No. 14-cv-00327-MEJ

**STIPULATION AND (~~PROPOSED~~) ORDER  
EXTENDING DISCOVERY AND DISPOSITIVE  
MOTIONS DEADLINES**

1           Whereas, on December 15, 2015, after consulting with counsel for both parties,  
 2 Magistrate Judge Beeler continued the date for the settlement conference in this action to April  
 3 26, 2016 (Dkt. 70);

4           Whereas, the new settlement conference date falls just before the deadline for disclosure  
 5 of expert witnesses, currently set for April 29, 2016 (Dkt. 65);

6           Whereas, in compliance with Judge Beeler's order, counsel for the parties have met and  
 7 conferred regarding a plan for discovery to occur before the settlement conference, as described  
 8 in the declaration of Alex Reese filed with this stipulation in compliance with Civil L.R. 6-2;

9           Whereas, the parties have agreed that extending certain discovery and dispositive motion  
 10 deadlines would better facilitate discovery and allow for meaningful settlement discussion at the  
 11 April 26 conference;

12          Whereas, extending the discovery and dispositive motion deadlines would not impact the  
 13 December 12, 2016 trial date or any pretrial deadlines in this case;

14          Therefore, the parties hereby stipulate and agree that the following deadlines are extended  
 15 as follows:

- 16           • Disclosure of Expert Witnesses: Extended from April 29, 2016 to May 27, 2016;
- 17           • Disclosure of Rebuttal Expert Witnesses: Extended from May 9, 2016 to June 10,  
               2016;
- 19           • Close of Discovery: Extended from May 24, 2016 to June 24, 2016;
- 20           • Deadline to File Dispositive Motions: Extended from June 23, 2016 to July 22,  
               2016;
- 22           • Hearing on Dispositive Motions: Extended from July 28, 2016 at 10:00 a.m. to  
               September 1, 2016 at 10:00 a.m. (or any other date that is convenient for the  
               Court);
- 25           • All other dates remain unchanged.

1 January 20, 2016

FARELLA BRAUN + MARTEL LLP

3 By: /s/ Alex Reese  
4 Alex Reese

5 Attorneys for Plaintiff Sanjay Bhatnagar

6 January 20, 2016

7 BRIAN J. STRETCH  
8 Acting United States Attorney

9 By: /s/ Robin M. Wall  
10 Robin M. Wall  
11 Assistant United States Attorney

12 Attorneys for Defendant United States of  
13 America

14 **FILER'S ATTESTATION**

15 In compliance with Civil L.R. Rule 5-1, I hereby attest that all parties have concurred in  
16 the filing of this Stipulation and (Proposed) Order Extending Discovery and Dispositive Motion  
17 Deadlines.

18  
19 January 20, 2016

/s/ *Alex Reese*

20  
21 Alex Reese

22  
23  
24 **(PROPOSED) ORDER**

25  
26 In accordance with a stipulation between the parties, IT IS ORDERED that the deadlines  
27 for discovery and dispositive motions are hereby extended as follows:  
28

- 1        • Disclosure of Expert Witnesses: Extended from April 29, 2016 to May 27, 2016;
- 2        • Disclosure of Rebuttal Expert Witnesses: Extended from May 9, 2016 to June 10,
- 3                  2016;
- 4        • Close of Discovery: Extended from May 24, 2016 to June 24, 2016;
- 5        • Deadline to File Dispositive Motions: Extended from June 23, 2016 to July 22,
- 6                  2016;
- 7        • Hearing on Dispositive Motions: Extended from July 28, 2016 at 10:00 a.m. to
- 8                  September 1, 2016 at 10:00 a.m. (or any other date that is convenient for the
- 9                  Court);
- 10      • All other dates remain unchanged.

11  
12 Date: January 20, 2015



13  
14 Honorable Maria-Elena James  
15 United States Magistrate Judge